

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT

IN RE:

BERNADINE ELVA ELAM

BANKRUPTCY NO.: 20-48969-TJT

CHAPTER 7

HONORABLE THOMAS J. TUCKER

DEBTOR

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GREGORY L. DODD (P43404)

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**RESPONSE TO MOTION FOR AUTHORITY TO REDEEM PERSONAL PROPERTY  
AND APPROVAL OF ASSOCIATED FINANCING AND ATTORNEY FEES  
UNDER 11 U.S.C. 722**

Santander Consumer USA Inc. ("Creditor"), in response to Debtor's Motion to Redeem Personal Property and Approval of Associated Financing and Attorney Fees Under 11 U.S.C. 722 regarding a 2018 Buick Encore, states as follows:

1. As to Paragraph 1, the Creditor neither admits nor denies and leaves the Debtor to her proofs.

2. As to Paragraph 2, the Creditor neither admits nor denies and leaves the Debtor to her proofs.

3. As to Paragraph 3, the Creditor denies that the fair market value of the vehicle is \$14,427.00. Based on the NADA Official Used Car Guide, Creditor asserts that the value of the vehicle is approximately \$18,875.00.

4. As to Paragraph 4, no response is required.
5. As to Paragraph 5, no response is required.

In conclusion, the Creditor prays that the Court deny Debtor's Motion for Redemption.

O'REILLY RANCILIO P.C.

*/s/ Craig S. Schoenherr, Sr.*

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DATED: September 28, 2020